

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS-----X
RONALD EASON,

Plaintiff,

-against-


THE ROMAN CATHOLIC DIOCESE OF BROOKLYN,
FRANCISCAN BROTHERS OF BROOKLYN, and
BISHOP FORD CENTRAL CATHOLIC HIGH SCHOOL,Defendants.
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TO THE ABOVE NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the plaintiff's attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: New York, New York
November 20, 2019

Yours etc.,
GAIR, GAIR, CONASON, RUBINOWITZ, BLOOM,
HERSHENHORN, STEIGMAN & MACKAUF
Attorneys for Plaintiff


PETER J. SAGHIR
80 Pine Street, 34th Floor
New York, New York 10005
(212) 943-1090

TO: See Attached Service Rider

Index No.: _____/19
Date Filed: _____/19SUMMONSPlaintiff designates Kings
County as the place of trial.Basis of venue: CPLR 503(a)
County in which a substantial
part of the events or
omissions giving rise to the
claim occurred.

SERVICE RIDER

THE ROMAN CATHOLIC DIOCESE OF BROOKLYN
310 Prospect Park West
Brooklyn, New York 11215

FRANCISCAN BROTHERS OF BROOKLYN
135 Remsen Street
Brooklyn, New York 11201

BISHOP FORD CENTRAL CATHOLIC HIGH SCHOOL
310 Prospect Park West
Brooklyn, New York 11215

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

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RONALD EASON,

Index No.: _____/19

Plaintiff,

VERIFIED COMPLAINT

-against-

THE ROMAN CATHOLIC DIOCESE OF BROOKLYN,
FRANCISCAN BROTHERS OF BROOKLYN, and
BISHOP FORD CENTRAL CATHOLIC HIGH SCHOOL,

Defendants.
-----X

Plaintiff, complaining of the defendants, by and through his attorneys, GAIR,
GAIR, CONASON, RUBINOWITZ, BLOOM, HERSHENHORN, STEIGMAN & MACKAUF,
respectfully shows to this Court and alleges as follows:

1. Upon information and belief, that at all times herein mentioned, defendant, THE
ROMAN CATHOLIC DIOCESE OF BROOKLYN, was and still is a not for profit religious
corporation duly organized and existing under and by virtue of the laws of the State of New
York.

2. Upon information and belief, that at all times herein mentioned, defendant, THE
ROMAN CATHOLIC DIOCESE OF BROOKLYN, owned a school known as Bishop Ford
Central Catholic High School located at 500 19th Street, Brooklyn, New York 11215.

3. Upon information and belief, that at all times herein mentioned, defendant, THE
ROMAN CATHOLIC DIOCESE OF BROOKLYN, its agents, servants and employees
managed, maintained, operated and controlled the aforesaid parish and school known as Bishop
Ford Central Catholic High School located at 500 19th Street, Brooklyn, New York 11215.

4. Upon information and belief, that at all times herein mentioned, defendant, THE

ROMAN CATHOLIC DIOCESE OF BROOKLYN, held itself out to the public as the owner of Bishop Ford Central Catholic High School located at 500 19th Street, Brooklyn, New York 11215.

5. Upon information and belief, that at all times herein mentioned, defendant, THE ROMAN CATHOLIC DIOCESE OF BROOKLYN, held itself and its agents, servants and employees out to the public as those who managed, maintained, operated and controlled Bishop Ford Central Catholic High School located at 500 19th Street, Brooklyn, New York 11215.

6. Upon information and belief, that at all times herein mentioned, defendant, FRANCISCAN BROTHERS OF BROOKLYN, was and still is a not for profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York.

7. Upon information and belief, that at all times herein mentioned, defendant, FRANCISCAN BROTHERS OF BROOKLYN, owned a school known as Bishop Ford Central Catholic High School located at 500 19th Street, Brooklyn, New York 11215.

8. Upon information and belief, that at all times herein mentioned, defendant, FRANCISCAN BROTHERS OF BROOKLYN, its agents, servants and employees managed, maintained, operated and controlled the aforesaid school known as Bishop Ford Central Catholic High School located at 500 19th Street, Brooklyn, New York 11215.

9. Upon information and belief, that at all times herein mentioned, defendant, FRANCISCAN BROTHERS OF BROOKLYN, held itself out to the public as the owner of Bishop Ford Central Catholic High School located at 500 19th Street, Brooklyn, New York 11215.

10. Upon information and belief, that at all times herein mentioned, defendant,

FRANCISCAN BROTHERS OF BROOKLYN, held itself and its agents, servants and employees out to the public as those who managed, maintained, operated and controlled Bishop Ford Central Catholic High School located at 500 19th Street, Brooklyn, New York 11215.

11. Upon information and belief, that at all times herein mentioned, defendant, BISHOP FORD CENTRAL CATHOLIC HIGH SCHOOL, was and still is a not for profit religious corporation duly organized and existing under and by virtue of the laws of the State of New York.

12. Upon information and belief, that at all times herein mentioned, defendant, BISHOP FORD CENTRAL CATHOLIC HIGH SCHOOL, owned a school known as Bishop Ford Central Catholic High School located at 500 19th Street, Brooklyn, New York 11215.

13. Upon information and belief, that at all times herein mentioned, defendant, BISHOP FORD CENTRAL CATHOLIC HIGH SCHOOL, its agents, servants and employees managed, maintained, operated and controlled the aforesaid school known as Bishop Ford Central Catholic High School located at 500 19th Street, Brooklyn, New York 11215.

14. Upon information and belief, that at all times herein mentioned, defendant, BISHOP FORD CENTRAL CATHOLIC HIGH SCHOOL, held itself out to the public as the owner of Bishop Ford Central Catholic High School located at 500 19th Street, Brooklyn, New York 11215.

15. Upon information and belief, that at all times herein mentioned, defendant, BISHOP FORD CENTRAL CATHOLIC HIGH SCHOOL, held itself and its agents, servants and employees out to the public as those who managed, maintained, operated and controlled Bishop Ford Central Catholic High School located at 500 19th Street, Brooklyn, New York 11215.

16. Upon information and belief, that at all times herein mentioned, Brother Basil was a Franciscan Brother.

17. Upon information and belief, that at all times herein mentioned, Brother Basil was a teacher at Bishop Ford Central Catholic High School located at 500 19th Street, Brooklyn, New York 11215.

18. Upon information and belief, Brother Basil is deceased.

19. Upon information and belief, that at all times herein mentioned, defendant, THE ROMAN CATHOLIC DIOCESE OF BROOKLYN, assigned Brother Basil to be a teacher at Bishop Ford Central Catholic High School.

20. Upon information and belief, that at all times herein mentioned, defendant, FRANCISCAN BROTHERS OF BROOKLYN, assigned Brother Basil to be a teacher at Bishop Ford Central Catholic High School.

21. Upon information and belief, that at all times herein mentioned, Brother Basil served as a teacher at Bishop Ford Central Catholic High School at the pleasure of defendant, THE ROMAN CATHOLIC DIOCESE OF BROOKLYN.

22. Upon information and belief, that at all times herein mentioned, Brother Basil was on the staff of defendant, THE ROMAN CATHOLIC DIOCESE OF BROOKLYN.

23. Upon information and belief, that at all times herein mentioned, Brother Basil was acting as an agent of defendant, THE ROMAN CATHOLIC DIOCESE OF BROOKLYN.

24. Upon information and belief, that at all times herein mentioned, Brother Basil was an employee of defendant, THE ROMAN CATHOLIC DIOCESE OF BROOKLYN.

25. Upon information and belief, that at all times herein mentioned, Brother Basil was acting in the course and scope of his employment with defendant, THE ROMAN CATHOLIC

DIOCESE OF BROOKLYN.

26. Upon information and belief, that at all times herein mentioned, defendant, THE ROMAN CATHOLIC DIOCESE OF BROOKLYN, hired Brother Basil.

27. Upon information and belief, that at all times herein mentioned, defendant, THE ROMAN CATHOLIC DIOCESE OF BROOKLYN, retained Brother Basil.

28. Upon information and belief, that at all times herein mentioned, defendant, THE ROMAN CATHOLIC DIOCESE OF BROOKLYN, supervised Brother Basil.

29. Upon information and belief, that at all times herein mentioned, Brother Basil was on the staff of defendant, BISHOP FORD CENTRAL CATHOLIC HIGH SCHOOL.

30. Upon information and belief, that at all times herein mentioned, Brother Basil was acting as an agent of defendant, BISHOP FORD CENTRAL CATHOLIC HIGH SCHOOL.

31. Upon information and belief, that at all times herein mentioned, Brother Basil was an employee of defendant, BISHOP FORD CENTRAL CATHOLIC HIGH SCHOOL.

32. Upon information and belief, that at all times herein mentioned, Brother Basil was acting in the course and scope of his employment with defendant, BISHOP FORD CENTRAL CATHOLIC HIGH SCHOOL.

33. Upon information and belief, that at all times herein mentioned, defendant, BISHOP FORD CENTRAL CATHOLIC HIGH SCHOOL, hired Brother Basil.

34. Upon information and belief, that at all times herein mentioned, defendant, BISHOP FORD CENTRAL CATHOLIC HIGH SCHOOL, retained Brother Basil.

35. Upon information and belief, that at all times herein mentioned, defendant, BISHOP FORD CENTRAL CATHOLIC HIGH SCHOOL, supervised Brother Basil.

36. Upon information and belief, that at all times herein mentioned, Brother Basil was

on the staff of defendant, FRANCISCAN BROTHERS OF BROOKLYN.

37. Upon information and belief, that at all times herein mentioned, Brother Basil was acting as an agent of defendant, FRANCISCAN BROTHERS OF BROOKLYN.

38. Upon information and belief, that at all times herein mentioned, Brother Basil was an employee of defendant, FRANCISCAN BROTHERS OF BROOKLYN.

39. Upon information and belief, that at all times herein mentioned, Brother Basil was acting in the course and scope of his employment with defendant, FRANCISCAN BROTHERS OF BROOKLYN.

40. Upon information and belief, that at all times herein mentioned, defendant, FRANCISCAN BROTHERS OF BROOKLYN, hired Brother Basil.

41. Upon information and belief, that at all times herein mentioned, defendant, FRANCISCAN BROTHERS OF BROOKLYN, retained Brother Basil.

42. Upon information and belief, that at all times herein mentioned, defendant, FRANCISCAN BROTHERS OF BROOKLYN, supervised Brother Basil.

43. Upon information and belief, that at all times herein mentioned, defendant, THE ROMAN CATHOLIC DIOCESE OF BROOKLYN, was responsible for the staffing and hiring at Bishop Ford Central Catholic High School located at 500 19th Street, Brooklyn, New York 11215.

44. Upon information and belief, that at all times herein mentioned, defendant, THE ROMAN CATHOLIC DIOCESE OF BROOKLYN, did the hiring and staffing at Bishop Ford Central Catholic High School located at 500 19th Street, Brooklyn, New York 11215.

45. Upon information and belief, that at all times herein mentioned, defendant, FRANCISCAN BROTHERS OF BROOKLYN, was responsible for the staffing and hiring at

Bishop Ford Central Catholic High School located at 500 19th Street, Brooklyn, New York 11215.

46. Upon information and belief, that at all times herein mentioned, defendant, FRANCISCAN BROTHERS OF BROOKLYN, did the hiring and staffing at Bishop Ford Central Catholic High School located at 500 19th Street, Brooklyn, New York 11215.

47. Upon information and belief, that at all times herein mentioned, defendant, BISHOP FORD CENTRAL CATHOLIC HIGH SCHOOL, was responsible for the staffing and hiring at Bishop Ford Central Catholic High School located at 500 19th Street, Brooklyn, New York 11215.

48. Upon information and belief, that at all times herein mentioned, defendant, BISHOP FORD CENTRAL CATHOLIC HIGH SCHOOL, did the hiring and staffing at Bishop Ford Central Catholic High School located at 500 19th Street, Brooklyn, New York 11215.

49. Upon information and belief, that at all times herein mentioned, Brother Basil had complaints of sexual abuse made against him.

50. Upon information and belief, that at all times herein mentioned, defendants, their agents, servants and employees knew or should have known of the aforesaid complaints of sexual abuse against Brother Basil.

51. Upon information and belief, that at all times herein mentioned, Brother Basil was a known sexual abuser of children.

52. Upon information and belief, that at all times herein mentioned, defendant, THE ROMAN CATHOLIC DIOCESE OF BROOKLYN, received complaints that Brother Basil had been a sexual abuser of children.

53. Upon information and belief, that at all times herein mentioned, defendant,

FRANCISCAN BROTHERS OF BROOKLYN, received complaints that Brother Basil had been a sexual abuser of children.

54. Upon information and belief, that at all times herein mentioned, defendant, BISHOP FORD CENTRAL CATHOLIC HIGH SCHOOL, received complaints that Brother Basil had been a sexual abuser of children.

55. Upon information and belief, that at all times herein mentioned, defendants, their agents, servants and employees, knew or should have known that Brother Basil had been the subject of complaints of sexual abuse.

56. Upon information and belief, that at all times herein mentioned, defendants, their agents, servants and employees, knew or should have known that Brother Basil was a known sexual abuser of children.

57. Upon information and belief, that at all times herein mentioned, defendants, their agents, servants and employees, could reasonably have anticipated that Brother Basil's sexual abuse complaints and sexual abuse of children would be likely to result in injury to others.

58. Upon information and belief, that at all times herein mentioned, defendants, their agents, servants and employees failed to investigate the aforesaid complaints against Brother Basil.

59. Upon information and belief, that at all times herein mentioned, defendants, their agents, servants and employees failed to properly, adequately and thoroughly investigate the aforesaid complaints against Brother Basil.

60. Upon information and belief, that at all times herein mentioned, defendants, their agents, servants and employees failed to report or refer the aforesaid complaints made against Brother Basil to the police or any other agency to be investigated.

61. Upon information and belief, that at all times herein mentioned, defendants, their agents, servants and employees carelessly, negligently and recklessly ignored and dismissed the aforesaid complaints against Brother Basil.

62. Upon information and belief, that at all times herein mentioned, the aforesaid complaints against Brother Basil had merit.

63. Upon information and belief, that at all times herein mentioned, defendants, their agents, servants and employees, knew or should have known that the aforesaid complaints against Brother Basil had merit.

64. That at all times herein mentioned, defendants, THE ROMAN CATHOLIC DIOCESE OF BROOKLYN, FRANCISCAN BROTHERS OF BROOKLYN, and, BISHOP FORD CENTRAL CATHOLIC HIGH SCHOOL, failed to establish policies and procedures directed towards protecting minors from sexual abuse.

65. That at all times herein mentioned, plaintiff, RONALD EASON, was enrolled as a student at Bishop Ford Central Catholic High School.

66. From approximately 1967 to 1968, Brother Basil using the trust and authority vested in him by defendants, began grooming plaintiff, RONALD EASON, while plaintiff was still an infant, to gain the trust of and control over the infant as part of his plan to sexually molest and abuse him.

67. From approximately 1967 to 1968, Brother Basil sexually abused plaintiff, RONALD EASON, while plaintiff was still an infant, and a student at Bishop Ford Central Catholic High School.

68. The aforesaid abuse constituted a sexual offense as defined in article one hundred thirty of the penal law committed against a child less than eighteen years of age, or the use of a

child in a sexual performance as defined in section 263.05 of the penal law, or a predecessor statute that prohibited such conduct at the time of the act, which conduct was committed against a child less than eighteen years of age.

69. Upon information and belief, that at all times herein mentioned, defendants, their agents, servants and employees knew or should have known that the sexual abuse by Brother Basil of plaintiff, RONALD EASON, while plaintiff was still an infant, was ongoing.

70. Defendants, THE ROMAN CATHOLIC DIOCESE OF BROOKLYN, FRANCISCAN BROTHERS OF BROOKLYN, and, BISHOP FORD CENTRAL CATHOLIC HIGH SCHOOL, trained and instructed Brother Basil for his employment at Bishop Ford Central Catholic High School.

71. Upon information and belief, that at all times herein mentioned, Brother Basil was under the direct supervision and control of defendants, THE ROMAN CATHOLIC DIOCESE OF BROOKLYN, FRANCISCAN BROTHERS OF BROOKLYN, and, BISHOP FORD CENTRAL CATHOLIC HIGH SCHOOL, when he performed the wrongful acts described herein.

72. That the aforesaid occurrences were caused or contributed to by the negligence, carelessness and recklessness and the willful, wanton, and grossly negligent conduct of the defendants, their agents, servants and/or employees, in: selecting, hiring, contracting and retaining Brother Basil to work with the plaintiff while plaintiff was still an infant and other children when it was known or should have been known to the defendants herein that Brother Basil had a history of complaints made against him and a propensity to sexually abuse children and in fact had sexually abused children; selecting, hiring, contracting and retaining Brother Basil when it was known or should have been known to the defendants herein that he did not

possess the requisite skills or qualifications to work with children; failing to properly and adequately supervise the conduct of Brother Basil as it related to the plaintiff while plaintiff was still an infant and other children when it was known or should have been known to the defendants herein that Brother Basil had a history of complaints made against him and a propensity to sexually abuse children and in fact had sexually abused children; failing to warn or advise the plaintiff, who was still an infant, his parents and others of Brother Basil's propensity to sexually abuse children and of the fact that he had sexually abused children whom he came in contact with by and through his roles at Bishop Ford Central Catholic High School; causing, permitting and allowing the sexual abuse to continue; failing to take any measures to stop the sexual abuse when it was known or should have been known to the defendants herein that the sexual abuse was continuing and ongoing; failing to establish adequate and effective professional training and educational programs and procedures for their employees calculated to prevent the sexual abuse of children; failing to implement any measures or take any steps to prevent Brother Basil from sexually abusing the plaintiff while the plaintiff was still an infant when it was known or should have been known to the defendants herein that Brother Basil had a history of complaints of sexual abuse made against him and a propensity to sexually abuse children and in fact had sexually abused children; failing to make any inquiry into the background of Brother Basil before selecting, hiring, contracting and retaining him; failing to make any inquiry into the background of Brother Basil before selecting, hiring, contracting and retaining him when it was known or should have been known before he was hired that Brother Basil had a propensity to sexually abuse children and had a history of complaints made against him; failing to use reasonable care to correct and remove Brother Basil and continuing to retain him when it was known or should have been known to the defendants herein that Brother Basil had a history of

complaints made against him and a propensity to sexually abuse children and in fact had sexually abused children and was sexually abusing children and that continuing to retain him would be likely to result in injury to others, including the plaintiff while plaintiff was still an infant; causing, permitting and allowing the plaintiff to be sexually abused while plaintiff was still an infant; and in otherwise being careless, negligent and reckless.

73. By reason of the forgoing, plaintiff, RONALD EASON, sustained physical and psychological injuries, including but not limited to, severe emotional distress, humiliation, fright, dissociation, anger, depression, anxiety, family turmoil, and loss of faith; a severe shock to his nervous system; certain internal injuries; and has been caused to suffer physical pain and mental anguish, and emotional and psychological damage as a result thereof, and, upon information and belief, some or all of these injuries are of a permanent and lasting nature; and, plaintiff, RONALD EASON, has been forced to abstain from the duties at his vocation, and has and/or will become obligated to expend sums of money for medical expenses.

74. That by reason of the foregoing, defendants are liable to plaintiff for punitive and exemplary damages.

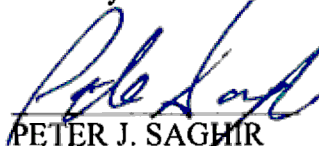
75. That the amount of damages sought exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

76. It is hereby alleged pursuant to CPLR 1603 that the foregoing cause of action is exempt from the operation of CPLR 1601 by reason of one or more of the exemptions provided in CPLR 1602, including but not limited to, CPLR 1602(5), 1602(7) and 1602(11).

WHEREFORE, the plaintiff demands judgment against the defendants, together with compensatory and punitive damages, together with the interest, cost, and disbursements pursuant to the causes of action herein.

Dated: New York, New York
November 20, 2019

Yours etc.,
GAIR, GAIR, CONASON, RUBINOWITZ, BLOOM,
HERSHENHORN, STEIGMAN & MACKAUF
Attorneys for Plaintiff

A handwritten signature in blue ink, appearing to read "Peter J. Saghir", is written over the printed name.

PETER J. SAGHIR
80 Pine Street, 34th Floor
New York, New York 10005
(212) 943-1090

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

PETER J. SAGHIR, an attorney at law licensed to practice in the courts of the State of New York, states that affirmant is a partner with the firm of Gair, Gair, Conason, Rubinowitz, Bloom, Hershenhorn, Steigman & Mackauf, attorneys for the plaintiff in the within action; that affirmant has read the foregoing

VERIFIED COMPLAINT

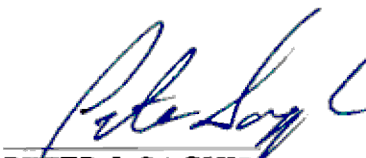
and knows the contents thereof; and that the same is true to affirmant's own knowledge except as to those matters therein stated to be alleged on information and belief and that as to those matters, affirmant believes them to be true.

Affirmant further states that the reason this verification is made by affirmant and not by the plaintiff is that the plaintiff is not within the County wherein affirmant maintains his office.

The grounds of affirmant's belief are investigation and data in affirmant's possession and consultations had with the plaintiff.

The undersigned affirms that the foregoing statements are true under penalty of perjury.

Dated: New York, New York
November 20, 2019


PETER J. SAGHIR